

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

NOV 14 2002

In the Matter of)
)
Proposal to Revise Multichannel Multipoint) RM-10S86
Distribution Service and the Instructional)
Television Fixed Service Rules)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: The Wireless Telecommunications Bureau

COMMENTS OF CATHOLIC TELEMEDIA NETWORK

The Catholic Telemedia Network submits these comments in support of the proposal ("Proposal") submitted by the Wireless Communications Association International, the National ITFS Association, and the Catholic Television Network to change the rules governing the Multichannel Multipoint Distribution Service ("MMDS") and the Instructional Television Fixed Service ("ITFS").¹ The revised rules would result in more streamlined licensing for MMDS and ITFS licensees, encourage the deployment of new wireless broadband services, and enhance the availability and usefulness of educational services across the United States.

The Catholic Telemedia Network provides educational programming to 38,000 students in more than 140 schools located in the counties of San Francisco, Marin, San Mateo, Santa Clara, Contra Costa and Alameda. The Catholic Telemedia Network has been using ITFS frequencies since 1970, and was one of the first educational entities in the San Francisco area to use ITFS to transmit to distant classrooms. Today, the Catholic Telemedia Network has a library with over 4,000 programs available for educational and professional training.

¹ See "Wireless Telecommunications Bureau Seeks Comment on Proposal to Revise Multichannel Multipoint Distribution Service and Instructional Television Fixed Service Rules," *Public Notice*, DA 02-2732 (rel. Oct. 17, 2002).


Schools served by the Catholic Telemedia Network have a significant number of students from multi-ethnic backgrounds. Many immigrant parents in the Bay Area look to Catholic schools to enable their children to receive a quality education. The schools, in turn, look to the Catholic Telemedia Network to help them meet the individual learning styles of this diverse student population. The Catholic Telemedia Network also offers videotapes and interactive conferences for adults that vary from teacher training, to life-long learning, and staff education. Programs are also offered to assist individuals with special needs such as seniors, disabled persons, and health care agencies.

Catholic Telemedia supports the Proposal because it provides a framework to protect existing ITFS operations while, at the same time, opening up the spectrum for a host of new two-way, interactive broadband services. The Proposal was the result of significant work by numerous ITFS and MMDS licensees, engineers, equipment vendors, and others with differing interests and perspectives.

Catholic Telemedia urges the Commission to move swiftly to issue a Notice of Proposed Rulemaking in response to the Proposal so that others will have an opportunity to comment, and new services can be deployed at the earliest possible time.

Respectfully submitted,

CATHOLIC TELEMEDIA NETWORK



By: Edwin N. Lavergne
Edgar Class III
Shook, Hardy & Bacon, LLP
600 14th Street, N.W., Suite 800
Washington, D.C. 20005-2004
Telephone: (202) 783-8400

November 14, 2002